

# EXHIBIT 11

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CIVIL ACTION NO. 10-cv-8668

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NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION, MARY WINTER, GENE  
STEINBERG, NANCY HART, SARAH WOLFF, KAREN  
SLAVEN, KATE KENNEDY, EDA DANIEL, and  
ANDREA SPERES,

Plaintiffs,

- against -

JACOB WOHL, JACK BURKMAN, J. M. BURKMAN &  
ASSOCIATES, LLC, PROJECT 1599, and JOHN  
and JANE DOES 1-10,

**Defendants .**

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# Virtual Zoom

New York, New York

**May 20, 2022**

10:18 a.m.

VIRTUAL DEPOSITION of ADAM  
FARRAGUT, a Non-Party Witness in the  
above-entitled action, held at the above  
time and place, taken before Jennifer  
Brennan, a Notary Public of the State of  
New York, pursuant to Subpoena.

1  
2 APPEARANCES:  
3

4 NEW YORK STATE OFFICE OF THE ATTORNEY  
5 GENERAL

6 Attorneys for Plaintiffs  
7 28 Liberty Street  
8 New York, New York 10005

9 BY: RICHARD SAWYER, ESQ.  
10 COLLEEN FAHERTY, ESQ.  
11 CONOR DUFFY, ESQ.

12 GERSTMAN SCHWARTZ LLP  
13 Attorneys for Defendants  
14 1399 Franklin Avenue  
15 Garden City, New York 11530

16 BY: RANDY KLEINMAN, ESQ.

17 ALSO PRESENT:  
18

19 ORRICK, HERRINGTON & SUTCLIFFE LLP  
20 Attorneys for Plaintiffs

21 51 West 52nd Street  
22 New York, New York 10019-6142

23 BY: BRITTANY ROEHRS, ESQ.

24 LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER  
25 LAW

1500 K Street NW  
Suite 900  
Washington, D.C. 20005

BY: MARC EPSTEIN, ESQ.  
BEN AIKEN, ESQ.

DAN ACOSTA, CONCIERGE

\* \* \*

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by  
and among counsel for the respective  
parties hereto, that the filing, sealing  
and certification of the within  
deposition shall be and the same are  
hereby waived;

IT IS FURTHER STIPULATED AND AGREED  
that all objections, except as to form of  
the question, shall be reserved to the  
time of the trial;

IT IS FURTHER STIPULATED AND AGREED  
that the within deposition may be signed  
before any Notary Public with the same  
force and effect as if signed and sworn  
to before the Court.

\* \* \*

1                   A. Farragut

2       the election, as a road to the presidency  
3       runs through them. I know one of the  
4       purposes of 1599 or stated purposes of  
5       1599 was to vet the candidates for  
6       suitability, I guess I would say,  
7       according to, you know, whatever their  
8       ideology is, that lines up with what Jack  
9       and/or Jacob believed the Republicans  
10      standard should believe in or all of  
11      those sorts of things.

12                   But it was a way to kind of  
13      insert themselves as either a potential  
14      authority on the upcoming election.

15           Q       So fair to say the Project 1599  
16      was an attempt by Mr. Burkman and Mr.  
17      Wohl to influence the 2020 election?

18           A       I don't know if it's to  
19      influence the 2020 election or to get  
20      publicity for themselves or one or the  
21      other or both.

22           Q       So one of the purposes or at  
23      least the stated purpose of Project 1599,  
24      is to influence the 2020 presidential  
25      election; correct?

1                   A. Farragut

2           A       Correct.

3           Q       And they were going to do that  
4 by, in your words, vetting candidates;  
5 correct?

6           A       Correct.

7           Q       And we're going to see examples  
8 of this, but they vetted candidates by --  
9 strike that.

10                   Do you recall any candidates  
11 that they vetted, in the history of  
12 Project 1599?

13           A       I don't necessarily know if  
14 this was vetting in regards to the  
15 presidential election or just  
16 highlighting or targeting influential  
17 politicians, but I believe there was Pete  
18 Buttigieg, Elizabeth Warren. Those are  
19 two largest names that I recall at the  
20 moment.

21           Q       Pete Buttigieg and Elizabeth  
22 Warren were both candidates for president  
23 in 2020 at some point; correct?

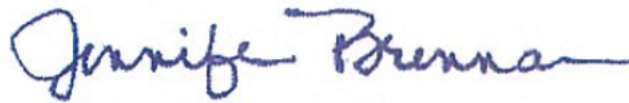
24           A       Correct.

25           Q       And Wohl and Burkman

C E R T I F I C A T I O N

I, JENNIFER BRENNAN, a Shorthand  
Reporter and a Notary Public, do hereby  
certify that the foregoing witness, was  
duly sworn on the date indicated, and  
that the foregoing is a true and accurate  
transcription of my stenographic notes.

I further certify that I am not  
employed by nor related to any party to  
this action.



JENNIFER BRENNAN